

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**EDWARD CONSTANTINESCU,
PERRY “PJ” MATLOCK,
JOHN RYBARCZYK,
GARY DEEL,
STEFAN HRVATIN,
TOM COOPERMAN,
MITCHELL HENNESSEY,
DANIEL KNIGHT.**

No. 4:22-CR-00612-S

**DEFENDANT EDWARD CONSTANTINESCU’S
MOTION TO UNSEAL ECF 276**

Defendant Edward Constantinescu (“Constantinescu”) respectfully requests the court unseal ECF 276, his Motion to Modify bail conditions and permit any responsive briefs to be unsealed. Constantinescu filed the motion under seal and now wishes to unseal the document and make the document available on the public docket. ECF 276 does not contain any confidential information. The government does not oppose the relief requested.

Dated: June 2, 2023

Respectfully submitted,

/s/ Matthew A. Ford

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CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2023, a true and correct copy of the foregoing document was served electronically on all counsel of record via the Court's CM/ECF.

/s/ Matthew A. Ford

Matthew A. Ford